

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

VICKY RODRÍGUEZ TORRES, et
al.
Plaintiffs
v.
Government Development
Bank P.R. (GDB), Guillermo
Camba Casas
Defendants

CIVIL No. 09-02199-FAB

RETALIATION, TORTS

TRIAL BY JURY

MOTION IN COMPLIANCE WITH ORDER TO SHOW CAUSE

Comes now the undersigned counsel, who states as follows:

1. The undersigned in **Doc.# 97** stated that the present case had been filed after plaintiff Rodriguez' had filed a petition in bankruptcy on December 19th, 2009, and that as such, he was incapable of including the present cause of action as a bankruptcy schedule asset. In fact, the present cause of action had been filed on November 25th, 2009, and therefore should have been included in said bankruptcy schedules.
2. The above misstatement was made in good-faith, as an innocent oversight by the undersigned.
3. Neither the undersigned, nor Rodríguez, stood to gain any advantage by the above mistake.
4. As reprehensible as the undersigned's mistake might have been, it was made through no fault of Rodríguez, or that of co-counsel Miguel Cuadros. The undersigned hereby takes full

responsibility for making the mistake, and for any consequences this Court sees fit to impose in retribution.

5. The undersigned hereby also leaves it entirely to this Court's discretion, the determination as to how and to what degree the undersigned needs to be admonished by this Court.

6. The undersigned submits to this Court, notwithstanding the above, that since no benefit or advantage has accrued to the undersigned or of any of the plaintiffs by the aforementioned mistake, that any other form of retribution would be extreme, and not commensurate to the undersigned's transgression.

WHEREFORE, the undersigned prays that this Honorable Court take **NOTICE** of all of the above.

SUBMITTED IN NEW YORK, NEW YORK, AUGUST 16th, 2010.

S/William E. Meléndez
William E. Meléndez
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CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties of interest.

IN NEW YORK, NEW YORK, AUGUST 16th, 2010.

S/William E. Meléndez
William E. Meléndez

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